

Control Number: 51812



Item Number: 118

Addendum StartPage: 0

PROJECT NO. 51812

2021 MAR 10 AM 10: 20

ISSUES RELATED TO THE STATE	§	PUBLIC UTILITY COMMISSION Y COMMISSION
OF DISASTER FOR THE	§	FILING CLERK
FEBRUARY 2021 WINTER	§	OF TEXAS
WEATHER EVENT	8	

COMMENTS REGARDING FEBRUARY 15, 2021 COMMISSION ORDER

Mid-South Electric Cooperative Association files these comments in support of the Comments Regarding February 15, 2021 Order filed by Brazos Electric Power Cooperative, Inc. on March 9, 2021 and the Joint Comments Regarding February 15, 2021 Order filed on March 9, 2021 by Bandera Electric Cooperative, Inc., Bluebonnet Electric Cooperative, Inc., Pedernales Electric Cooperative, Inc., and the City of San Marcos, Texas.

Mid-South Electric Cooperative Association is a distribution cooperative member of Brazos Electric Power Cooperative, Inc. ("Brazos Electric"). For the reasons outlined by Brazos Electric in its March 9, 2021 Comments, Mid-South Electric Cooperative Association respectfully requests that the Commission enforce, or in the alternative clarify, its February 15 Order¹ to ensure that immediately after customer firm load shed ended at 23:55 on February 17, 2021, energy market clearing prices are returned to normal without any administrative price adders. Because Mid-South Electric Cooperative Association placed the immediate humanitarian needs of its members above financial interests and restored power as quickly as possible after the load-shed directive lifted, its members now potentially face significant financial harm.

For these reasons, the recommendation of the Independent Market Monitor should be followed, and the artificial \$9,000 price for energy should be reduced after ERCOT rescinded its order to shed load.

¹ Project No. 51617, Oversight of the Electric Reliability Council of Texas, Order Directing ERCOT to Take Action and Granting Exception to Commission Rules (Feb. 15, 2021) (herein, "February 15 Order") (refiled in Project No. 51812). The February 15, 2021 Order was replaced by an Order on February 16, 2021, but the February 16 Order did not change the section of the February 15 Order addressed here.

Respectfully Submitted,

Kerry Kelton

General Manager/CEO
Mid-South Electric Cooperative Association